

EXHIBIT 12

CONFIDENTIAL

In accordance with a protective order, the enclosure(s) shall be treated as confidential and shall not be shown to any person other than those persons designated in paragraph 8.2 of the paragraph order.



FEDERAL RESERVE BANK *of* KANSAS CITY



January 27, 2022

Chuck Thompson
Chief Legal Officer | Chief Compliance Officer
Avanti Financial Group, Inc.
(sent via email to chuck@avantibank.com)

Re: *Legal Eligibility / Avanti Financial Group, Inc.*

Chuck,

Rob Triano forwarded your email from yesterday relating to legal eligibility. I am responding on behalf of the Bank.

As was recently conveyed to your counsel, Derek Bush of Cleary, Gottlieb, Steen & Hamilton LLP, it has been determined Avanti satisfies the threshold definition of an entity eligible to maintain a master account. This determination is based on analysis of Avanti and its business model and should not be viewed as a precedent for any other institutions.

As you know, efforts related to potential access to Federal Reserve accounts and services by novel, non-traditional charters and the permissibility of crypto-asset related activities remain under active evaluation. As a result, a decision regarding whether to grant Avanti a master account at FRBKC has not been reached.

Per your request, we intend to convey this decision to Accuity later today. Accuity may choose to grant Avanti a routing transit number as part of its process. Consistent with your previously communicated intent, this routing number may only be used for testing purposes at this time. As no final determination has been made with regard to master account access, Avanti assumes the risk of developing a processing system or incurring other costs.

Please feel free to contact me at craig.zahnd@kc.frb.org or (816) 881-2533 with any questions.

Sincerely,

Craig Zahnd
General Counsel